

1 there's a reference to something called For the People Number  
2 8, Plant Site Recycling. Do you recall that?

3 A That would not have been for us. That would  
4 have been for something with abandoned properties, that was  
5 probably the Greenfield Law. That would not have been  
6 anything with us.

7 Q And on the next page there's a reference to  
8 something called Public Safety in Reading/Reading Recycling.  
9 It refers to a public service announcement. Do you recall  
10 that?

11 A Yes.

12 Q And what was that?

13 A That was basically, again, just talking about  
14 the importance of recycling and that was -- it was just a PSA,  
15 just reminding people to get involved in it, and it was also  
16 trying to convince people to be more careful with buying  
17 products so that they didn't have to worry about throwing them  
18 away or recycling them.

19 Q And is that description that appears here an  
20 accurate description of the PSA?

21 A Yes.

22 Q And was this aired just on WTVE or on other  
23 stations as well?

24 A Just on WTVE.

25 Q You mentioned Frank McCracken. Were there other

1 people at the station that you had dealings with?

2 A Yes.

3 Q Do you recall who they were?

4 A There was just one -- one girl, and I don't  
5 remember her name. She worked in the -- the studio itself.  
6 And I -- unfortunately I can't remember her name. I can  
7 picture her, but I can't remember her name.

8 Q All right.

9 A Sorry.

10 MR. HUTTON: That's fine. I have nothing else.

11 THE WITNESS: Okay. Councilman McCracken was  
12 not involved, to my knowledge, with the TV station during that  
13 time. He was simply my boss.

14 MR. HUTTON: Okay.

15 THE WITNESS: At the time we did the ads - - -

16 MR. HUTTON: All right.

17 THE WITNESS: - - - or PSAs.

18 MR. HUTTON: Okay. Thank you.

19 MR. BECHTEL: Kim Bradley?

20 THE WITNESS: That's it.

21 MR. HUTTON: Yeah. That's what I thought.

22 THE WITNESS: Yeah.

23 BY MR. BECHTEL:

24 Q The last PSA that you were asked about on the  
25 last page of Exhibit 3, the Public Safety in Reading/Reading

1 Recycling, - - -

2 A Right.

3 Q - - - you, I believe, indicated that Channel 51  
4 was the only station that broadcast this PSA?

5 A That's correct. They were the ones that  
6 actually did the filming for us.

7 Q Would you have taken a PSA like that to the  
8 Philadelphia stations for any reason?

9 A No.

10 Q Why not?

11 A We just basically whenever -- like when BCTV  
12 would do PSAs for us they would broadcast them on that station  
13 alone. We didn't ask for copies of those to distribute to any  
14 other place.

15 Q Do you think a Philadelphia TV station would be  
16 interested in a Reading oriented spot like that?

17 A They may be. They may have been. I know that  
18 they did cover -- I don't know if it was a Philadel -- yeah,  
19 it was a Philadelphia, Channel 2 I think, when the city was  
20 looking at the trash program, which was certainly a big issue,  
21 did cover that, cover that issue on their local TV.

22 Q I don't want to put words in your mouth but  
23 would you say if it was a major issue or a major -- major  
24 issue, that was your word, it would have been more likely to  
25 get on a Philadelphia station rather than a local -- cable or

1 local station?

2           A           I think it probably would have been on both.  
3 I'm not -- I'm not saying that it would more likely only be on  
4 the Philadelphia station, but I think that if it was a big  
5 enough issue, it certainly would be on our local and it may  
6 have a better chance of hitting the Philadelphia as well.

7           MR. BECHTEL:   That was a very valid point,  
8 which I had missed in my question.

9           Thank you.

10          THE WITNESS:   Thank you.

11          (Whereupon, the deposition concluded at 12:12  
12 o'clock p.m.)

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1 I have reviewed my deposition and it is true and  
2 correct except for any corrections noted on the attached  
3 Errata Sheet, which I have also signed.

4

5

6

7 DATE: \_\_\_\_\_

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11 \_\_\_\_\_  
12 Jane Meeks Squibb

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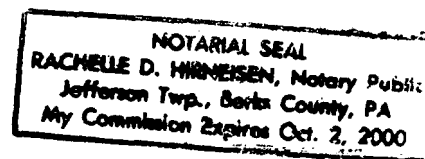
I, Rachelle D. Hirneisen, the officer before whom the deposition of JANE MEEKS SQUIBB was taken, do hereby certify that JANE MEEKS SQUIBB, the witness whose testimony appears in the foregoing deposition, was duly sworn by me on October 21, 1999, and that the transcribed deposition of said witness is a true record of the testimony given by her; that the proceedings are herein recorded fully and accurately to the best of my ability; that I am neither attorney nor counsel for, nor related to any of the parties to the action in which this deposition was taken; and, further, that I am not a relative of any attorney or counsel employed by the parties hereto or financially interested in this action.

Rachelle D. Hirneisen, RMR

Notary Public in and for  
the Commonwealth of Pennsylvania

My Commission expires October 2, 2000

BERKS COURT REPORTING SERVICE



FILE COPY

RECEIVED

Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

SEP 28 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

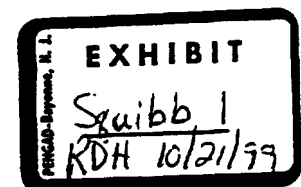
In re Applications of ) MM Docket No. 99-153  
)  
READING BROADCASTING, INC. ) File No. BRCT-940407KF  
)  
For Renewal of License of )  
Station WTVE(TV), Channel 51 )  
Reading, Pennsylvania )  
)  
and )  
)  
ADAMS COMMUNICATIONS CORPORATION ) File No. BPCT-940630KG  
)  
For Construction Permit for a New )  
Television Station to Operate on )  
Channel 51, Reading, Pennsylvania )

To: Magalie Roman Salas, Secretary  
for direction to  
The Honorable Richard L. Sippel  
Administrative Law Judge

NOTICE BY ADAMS OF DEPOSITION  
UPON ORAL EXAMINATION

Adams Communications Corporation ("Adams") gives notice of its intent to take the deposition of Jane Meeks Squibb, City Hall, 815 Walnut Street, Reading, PA 19601, upon oral examination on Thursday, October 21, 1999, commencing at 12 noon at the Comfort Inn, 2200 Stacy Drive, Reading, PA. We anticipate the deposition will be concluded within one hour. This is one of several depositions being taken during the period Wednesday, October 20, 1999, through Saturday, October 23, 1999. If the date and time cannot be accommodated, please contact Simone Parrish at 202-833-4190 collect, who will make an effort to revise the schedule to accommodate you. The subject of the deposition is your knowledge of programming and operations of station WTVE, channel 51, during the period August 1, 1989

READING EXHIBIT 31  
PAGE 17



through July 31, 1994. The deposition will be taken before a court reporter.

Respectfully submitted,

Gene A. Bechtel / sP

Gene A. Bechtel  
Harry F. Cole

Bechtel & Cole, Chartered  
Suite 250, 1901 L Street, N.W.  
Washington, D.C. 20036  
Telephone 202-833-4190  
Telecopier 202-833-3084

Counsel for Adams Communications  
Corporation

September 28, 1999



CERTIFICATE OF SERVICE

I certify that I have this 28th day of September 1999 caused copies of the foregoing NOTICE BY ADAMS OF DEPOSITION UPON ORAL EXAMINATION to be hand delivered to the offices of the following:

The Hon. Richard L. Sippel  
Administrative Law Judge  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

James Shook, Esq.  
Mass Media Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Thomas J. Hutton, Esq.  
Holland & Knight, L.L.P.  
Suite 200, 2000 K Street, N.W.  
Washington, D.C. 20006  
Counsel for Reading Broadcasting, Inc.



---

Simone Parrish  
Legal Assistant

**SUBPOENA**

**ORIGINAL** - To be executed by the person who effects service and returned to the Secretary of the Commission.

UNITED STATES OF AMERICA

FEDERAL COMMUNICATIONS COMMISSION

IN THE MATTER OF  
READING BROADCASTING, INC.  
For Renewal of License for

MM Docket No. 99-153

Station WTVE(TV), Channel 51,  
Reading, Pennsylvania

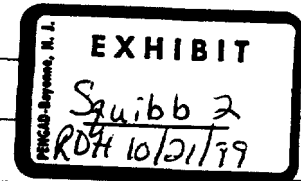
THE PRESIDENT OF THE UNITED STATES OF AMERICA

To Jane Meeks Squibb, City Hall, 815 Walnut Street,  
Reading, PA 19601 GREETINGS:

YOU ARE HEREBY ORDERED under penalty of law to appear before the Federal Communications Commission or  
any duly authorized notary public at the Comfort Inn, 2200 Stacy Drive  
(Name and official title of person authorized to take depositions)

in the city of Reading, PA on the 21st day of October, 1999,  
at 12 o'clock noon XM, of that day, to testify in the above-captioned matter and to bring with you and to  
produce then and there the following books, papers, and documents: See attached

READING EXHIBIT 31  
PAGE 20



BY ORDER OF THE FEDERAL COMMUNICATIONS COMMISSION, this twenty-eighth day of  
September, 1999, Richard L. Hippel  
(Official Title)  
Administrative Law Judge

NOTICE: - Witness fees and mileage for attendance under this subpoena for service hereof are to be paid by the party at whose instance the witness is subpoenaed, and every copy of this summons for the witness must contain a copy of this notice.

Service of subpoenas may be made by any citizen of the United States over the age of 18 years who is competent to be a witness, and is not a party to or in any way interested in the proceeding.

PROOF OF SERVICE ON REVERSE SIDE.

Attachment 1:

DOCUMENTS TO BE PRODUCED

All documents of any kind or description relating to the deponent's knowledge of or familiarity with the operations, including the programming, of Station WTVE(TV), Reading, Pennsylvania, during the period August 1, 1989 through July 31, 1994.

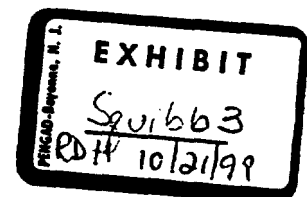
October 21, 1999

PROGRAMS/ISSUES REPORTS

3RD QUARTER 1989 - 3RD QUARTER 1994

WTVE-51  
READING, PA

JANE MEEKS SQUIB  
PENNSYLVANIA RECYCLING



ISSUES AND PROGRAMS REPORT  
FIRST QUARTER  
1990

WTVE-TV 51  
1729 NORTH ELEVENTH STREET  
READING, PENNSYLVANIA 19604

COMPILED BY:  
GEORGE MATTMILLER  
MARCH, 1990

TV-51 continued working for PENNSYLVANIA CRIME STOPPERS, producing, scripting, editing, and airing :30's that alert the viewership of crimes in the area.

The KEYSTONE SAFETY BELT NETWORK had a :30 produced and aired on TV-51 featuring the benefits of wearing seat belts.

"IN THE COMMUNITY INTEREST" highlighted area events in a community calendar format, including the KUTZTOWN FESTIVAL, the HEART ASSOCIATION SOUTH CENTRAL PENNSYLVANIA CHAPTER, and the GIRL SCOUTS GREAT VALLEY COUNCIL.

TV-51 aired this other Public Service Announcements during the First Quarter of 1990:

- \*BERKS COUNTY UNITED WAY
- \*ST. JUDE HOSPITAL
- \*SAFETY BELT EDUCATION CAMPAIGN--U.S. DEPARTMENT OF TRANSPORTATION
- \*HABITAT--"HOMELESS CHILDREN"
- \*U.S. COAST GUARD (BOATING SAFETY)
- \*THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS--"HOMEFRONT CAMPAIGN"
- \*AMERICAN CANCER SOCIETY--COLON CANCER
- \*AMERICAN LUNG ASSOCIATION--"LUNG LINE"
- \*PENNSYLVANIA EQUAL OPPORTUNITY DEPARTMENT
- \*OPHTHOMOLOGIST ASSOCIATION OF PENNSYLVANIA--EYE SAFETY
- \*ROTARY CLUB--"SUPPORT YOUR LOCAL ROTARY CLUB"
- \*U.S. ENVIRONMENTAL PROTECTION AGENCY/FOREST SERVICE--RECYCLING TRASH ("TEACH YOUR KIDS TO RECYCLE")
- \*MADD--"IT'S THE LITTLE THINGS THAT MAKE US MADD"
- \*U.S. DEPARTMENT OF TRANSPORTATION--"DRINKING AND DRIVING CAN KILL A FRIENDSHIP"
- \*THE COUNCIL OF STATE GOVERNMENTS--"DROPOUT"
- \*LAYMEN'S NATIONAL BIBLE ASSOCIATION, INC.--"READ THE BIBLE"
- \*U.S. POSTAL SERVICE--COMMEMORATIVE STAMPS ("AMERICAN OYLYMPIANS")
- \*NATIONAL EASTER SEAL SOCIETY--CHILDREN WITH DISABILITIES
- \*THE NATIONAL ARBOR DAY FOUNDATION--"TREE CITY, U.S.A."



WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the below dates and times:

Title: PA RECYCLING Length: :30

04/01/92	04/10/92	04/20/92
09:22:30A	11:19:00A	04:21:33A
		10:48:00A
04/02/92	04/11/92	04:19:50P
10:22:10A	04:22:55A	04/21/92
05:21:58P	01:19:46P	03:22:05P
04/03/92	04/12/92	
		04/22/92
04:21:00A	04:21:30A	
11:17:15A		02:21:56P
06:21:58P	04/13/92	
		04/23/92
04/04/92	04:21:05A	
	11:19:50A	05:22:34P
04:20:55A		
12:20:46P	04/14/92	04/24/92
04/05/92	03:21:55A	10:21:43A
	12:18:20P	05:21:27P
03:20:52A		
12:17:33P	04/15/92	
04/06/92	05:21:28A	
04:25:13A	04/16/92	
06:20:26P		06:21:08A
04/07/92	04/17/92	
04:24:35A		
06:21:40P	04:22:03A	
	04:17:55P	
04/08/92	04/18/92	
03:17:27A		
11:20:24A	03:19:53A	
	04:22:01P	
04/09/92	04/19/92	
03:18:31A		
11:19:40A	03:19:47A	
	04:21:45P	

Notary Signature \_\_\_\_\_

Date \_\_\_\_\_

READING EXHIBIT 31  
PAGE 25

ISSUES AND PROGRAMS REPORT  
SECOND QUARTER  
1993

WTVE-TV51  
1729 NORTH ELEVENTH STREET  
READING, PENNSYLVANIA 19604

COMPILED BY:  
GEORGE MATTMILLER





WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the below dates and times:

Title: RECYCLING Length: :30

04/27/93

09:22:01A

01:25:51P

06:23:52P

04/28/93

04:56:22A

11:25:00A

03:54:20P

08:22:38P

10:50:54P

04/29/93

00:21:24A

05:22:57A

08:24:46P

10:44:36P

04/30/93

03:21:26A

06:20:16A

11:24:55P

\_\_\_\_\_  
Notary Signature

\_\_\_\_\_  
Date

READING EXHIBIT 31  
PAGE 27



WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the below dates and times:

Title: RECYCLING

Length: :30

05/01/93

05:23:24A

01:24:50P

05:24:32P

08:48:41P

09:54:26P

05/02/93

05:21:17A

03:54:03A

01:21:13P

05:21:19P

06:54:25P

05/03/93

03:25:27A

06:23:27A

11:22:10P

05/04/93

03:24:57A

01:21:35P

05/05/93

03:27:03A

09:25:24P

05/06/93

03:22:27A

02:26:00P

10:47:23P

\_\_\_\_\_  
Notary Signature

\_\_\_\_\_  
Date

**READING EXHIBIT 31  
PAGE 28**

ISSUES AND PROGRAMS REPORT

FIRST QUARTER

1994

WTVE-TV51-TV 51

1729 NORTH ELEVENTH STREET

READING, PENNSYLVANIA 19604

COMPILED BY:

GEORGE MATTMILLER

**WTVE TV51 CERTIFICATION OF AFFIDAVIT PERFORMANCE REPORT**      Page: 1

This is to certify that WTVE-TV51 aired the following announcements  
at the dates and times shown below (times accurate within 15 minutes):

Title: RECYCLING      Length: :30      Type: PSA

01/10/94  
06:17:30

01/11/94  
07:17:30

02/08/94  
17:22:00

03/16/94  
20:21:30

**READING EXHIBIT 31  
PAGE 30**

ISSUES AND PROGRAMS REPORT  
SECOND QUARTER  
1994

WTVE-TV 51  
1729 NORTH ELEVENTH STREET  
READING, PENNSYLVANIA 19604

COMPILED BY:  
GEORGE MATTMILLER

This is to certify that WTVE-TV51 aired the following announcements  
at the dates and times shown below (times accurate within 15 minutes):

Title: ALUM. CAN RECYCLING Length: :30 Type: PSA

04/01/94	04/16/94	05/03/94
02:19:00	00:54:00	05:20:30
09:21:00	04:19:30	
23:20:00	19:21:00	05/04/94
		05:20:30
04/02/94	04/17/94	
02:19:00	00:54:00	05/05/94
09:21:00	04:19:30	05:20:30
23:20:00		
	04/18/94	05/06/94
	00:54:00	05:20:30
04/03/94	04:19:30	
08:48:00		05/07/94
09:28:00	04/19/94	05:19:00
11:54:00	00:54:00	20:19:00
23:20:00	04:19:30	
		05/08/94
04/04/94	04/20/94	05:19:00
02:19:00	00:54:00	20:19:00
09:21:00	04:19:30	
23:20:00		05/09/94
	04/21/94	05:19:00
04/05/94	00:54:00	20:20:30
02:19:00		
09:21:00	04/22/94	05/11/94
23:20:00	00:54:00	02:19:00
04/06/94	04/23/94	05/12/94
02:19:00	00:54:00	02:19:00
09:21:00	14:20:30	
23:20:00		05/13/94
	04/24/94	02:19:00
04/07/94	00:54:00	
01:46:10	11:13:00	05/14/94
	14:20:30	03:20:30
04/08/94		
01:46:10	04/25/94	05/15/94
	00:54:00	03:20:30
04/09/94		
01:18:30	04/26/94	05/16/94
	05:20:30	02:19:00
04/10/94		
01:18:30	04/27/94	05/17/94
08:47:00	05:20:30	02:19:00
04/11/94	04/28/94	05/18/94
01:46:10	05:20:30	02:19:00
04/12/94	04/29/94	05/19/94
01:46:10	05:20:30	02:19:00
04/13/94	04/30/94	
01:46:10	05:20:30	
04/14/94	05/01/94	
01:46:10	05:20:30	
04/15/94	05/02/94	
00:54:00	05:20:30	
04:19:30		

This is to certify that WTVE-TV51 aired the following announcements  
: the dates and times shown below (times accurate within 15 minutes):

Title: NEWS TO YOU "PLASTIC RECYCLING" Length: 2:00 Type: PSA

04/27/94	05/15/94
08:19:30	14:17:00
	20:19:00
04/28/94	05/16/94
08:19:30	07:19:30
04/29/94	05/17/94
08:19:30	07:19:30
04/30/94	05/18/94
14:18:00	07:19:30
05/01/94	05/20/94
14:18:00	07:19:30
05/02/94	05/23/94
08:19:00	07:19:30
05/03/94	
08:19:30	
05/04/94	
08:19:30	
05/05/94	
08:19:30	
05/06/94	
08:19:00	
14:18:00	
05/07/94	
22:17:30	
05/08/94	
12:18:00	
22:17:30	
05/09/94	
22:17:30	
05/10/94	
07:19:30	
05/11/94	
07:19:30	
05/12/94	
07:19:30	
05/13/94	
07:19:30	
05/14/94	
14:17:00	
20:19:00	
05/15/94	
12:18:00	

ISSUES AND PROGRAMS REPORT  
THIRD QUARTER  
1994

WTVE-TV 51  
1729 NORTH ELEVENTH STREET  
READING, PENNSYLVANIA 19604

COMPILED BY:  
GEORGE MATTMILLER



For The People #8 "Plant Site Recycling"

In areas such as Reading, there are many abandoned, unused industrial sites. Business usually pick green farm land in order to establish new businesses for fear of environmental laws, but with the new bill, businesses will be able to re-use these properties. This PSA covers this story in detail.

"Welcome America '94"

This PSA features the Mayor of Philadelphia, Ben Franklin, Betsy Ross and other characters telling guests to come to Philadelphia to celebrate the nation's birthday.

Sports In Motion - #1 "Mario Retires"

Local racing legend Mario Andretti, is calling it quits at age 54. Mr. Andretti has been a pillar of the community in Nazareth, Pennsylvania, which is a small town in the region. Ever since coming from Italy in 1955, Mario Andretti has provided the racing world a gracious and humble champion, on and off the track. The program consists of interview segments, B-roll, an introduction and conclusion with a host in studio.

Sports In Motion - #2 "Sports Off Ramp"

The information superhighway will play a major role in the future of sports. ESPN and "Prodigy" have teamed up to create ESPNet, an on-line service designed to coordinate the sports information field in a compact, easily accessible package. The future of sports information may hinge on programs like ESPNet. Program consists of interviews, B-roll, and a host introduction and conclusion.

Sports In Motion - #3 "Lynn St. James"

The program is an informative piece about Lynn St. James, a female race car driver. She already received rookie of the year as well as many top finished. Contains intro and outro and B-roll footage and interview footage.

Sports In Motion - #4 "Steve Little #1"

This segment spotlights local boxing star Steve Little. It discusses his roots, career rise to the top and up-coming title defense in Argentina.